



U.S. Department of Justice

United States Attorney  
Southern District of New York

May 17, 2023

**VIA ECF**

The Honorable John P. Cronan  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *Reclaim the Records et al., v. U.S. Dep't of State*, 23-cv-01650 (JPC)

Dear Judge Cronan:

This Office represents the U.S. Department of State (the “Government”) in the above-referenced action brought under the Freedom of Information Act (“FOIA”). We write jointly with Plaintiffs Reclaim the Records and Alec Ferreti (“Plaintiffs”) to provide the Court with a status update pursuant to the Court’s April 20, 2023 Order. *See* ECF No. 10.

The parties are still in the process of discussing the scope of Plaintiffs’ requested search. Because this is a FOIA case, we anticipate that this matter will either be resolved consensually, or through motions for summary judgment on any issues the parties are unable to resolve.

We therefore respectfully request that: (1) the parties be given an additional thirty days to work together to resolve this matter without the Court’s intervention; and (2) the parties be required to provide the Court with a written status update on or before June 19, 2023. If the parties agree upon the scope of the requested search, we will negotiate a production schedule and advise the Court of same. If we reach an impasse as to the scope of the requested search, we will propose a briefing schedule for motions for summary judgment.

We thank the Court for its consideration of this letter.

Respectfully,

BELDOCK LEVINE &  
HOFFMAN LLP  
*Attorney for Plaintiffs*

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York

By: /s/ Jeff Kinkle  
Jeff Kinkle

By: /s/ Rebecca L. Salk  
REBECCA L. SALK

99 Park Avenue, PH/26<sup>th</sup> Floor  
New York, New York 10016  
Tel: (212) 277-5824  
Jkinkle@blhny.com

Assistant United States Attorney  
86 Chambers Street, Third Floor  
New York, New York 10007  
Tel.: (212) 637-2614  
Rebecca.Salk@usdoj.gov

The request is granted. The parties' deadline to submit a status letter as to how they intend to proceed in this case is adjourned to June 19, 2023.

SO ORDERED.

May 18, 2023  
New York, New York

A handwritten signature in black ink, appearing to read "John P. Cronan", written over a horizontal line.

JOHN P. CRONAN  
United States District Judge